

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-vs-
Rafael Figueroa and Wilma Garcia

CRIMINAL COMPLAINT
CASE NUMBER: 3:06-mj-36

I, Michael T. Baumgardner, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

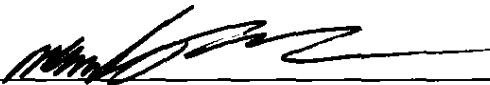
Count 1: On or about March 3, 2006 in Lackawanna County, in the Middle District of Pennsylvania, the defendant, Rafael Figueroa, did knowingly, intentionally and unlawfully possess with intent to distribute, and did distribute heroin and cocaine base (crack), a Scheduled controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1).

Count 2: On or about March 3, 2006 in Lackawanna County, in the Middle District of Pennsylvania, the defendant, Wilma Garcia, did knowingly, intentionally and unlawfully possess with intent to distribute, and did distribute heroin, a Scheduled controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. X Yes No


Signature of Complainant

Sworn to before me, and subscribed in my presence

3/14/06
Date

Scranton PA
City and State

THOMAS M. BLEWITT, U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer